

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
Administration of the)
North American Numbering)
Plan, Carrier Identification)
Codes (CICs))

CC Docket 92-237

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REPLY COMMENTS OF GENERAL COMMUNICATION, INC.

General Communication, Inc. (GCI) hereby submits reply comments on the Commission's Order on Reconsideration, Order on Application for Review, and Second Further Notice of Proposed Rulemaking (Notice).¹ Herein, GCI responds to the comments filed by United Utilities requesting that Alaska local exchange carriers (LECs) either be excluded from the duty to upgrade their switches to make them equal access capable; or, to grant an exemption to remote Alaska locations with fewer than 500 access lines; or alternatively to allow rural LECs to wait to upgrade their switches until AT&T Alascom has an approved tariff to transport competing IXCs 101xxx dialed traffic and the company has a bona fide request from the customer to originate such traffic.

The Commission should resist the temptation to grant Untied Utilities' request. The consumers in Alaska should be capable of reaching their choice of interexchange carrier via 101XXX. Most of the switches deployed in rural Alaska are technically feasible

¹Administration of the North American Numbering Plan, Carrier Identification Codes (CICs), FCC 97-386, released October 22, 1997.

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of being upgraded through a simple software load because most of the switches are digital. The Alaska LECs have been on notice since 1985 that the Commission supported implementation of the upgrades necessary to provide equal access as soon as practical, according to a schedule and a degree of implementation that reflected the capital constraints of the company and the market and other business conditions of the area served by the end office.²

In the Notice, the FCC has tentatively concluded the following:

(1) that all LEC end offices, including those LECs whose end offices equipped with SPC switches, but have not received a bona fide request for equal access and those LECs whose end offices equipped with non-SPC switches, should nevertheless be required to provide equal access.

(2) that LECs with SPC switches that have not received a bona fide request for equal access should be required to upgrade their facilities to provide equal access and to accept 4 digit CICs within three years of the effective date of an Order adopted in this proceeding.

(3) that LECs whose end offices are equipped with non-SPC switches should be required to provide equal access and to convert their switches to accept 4 digit CICs when they next replace their switching facilities.

(4) that these requirements are not inconsistent with the Independent Telephone Company Equal Access Report and Order, that equal access occur as soon as practicable.

This conclusion must be adopted with an accelerated

²MTS/WATS market Structure, (Independent Telephone Company Equal Access Report and Order), 100 F. 2d 860 (1985).

timetable of one year.³

The Independent Telephone Company Equal Access Report and Order was originally adopted twelve years ago. The independent LECs argued at that time that the necessary equipment to implement equal access was not readily available or that there was a lack of defined technical specifications for equal access.⁴ These complaints are not true today. The software necessary to implement equal access in the end offices is readily available from all switch manufacturers. In fact, the software upgrade is usually packaged with other features that enables the LEC to provide many other services. For example, the LECs need the equal access software upgrade to provide vertical features and more advanced services,⁵ as supported by the Telecommunications Act of 1996. Mandating that the independent LECs implement this software upgrade will enable interexchange competition to flourish and will enable the LEC to offer more advanced services to its customers.

This requirement is particularly important to Alaska. Recently, several LECs in Alaska have fought and delayed in providing GCI FGB interconnection in several locations. As stated in our comments, GCI has waited over a year to receive FGB

³The LECs could certainly ask for more time under the waiver process. However, the LECs have been on notice for over 12 years that they should implement equal access.

⁴Id at 866-867.

⁵In the Telecommunications Act of 1996, Congress encourages the deployment of advanced services. Ubiquitous equal access will allow many benefits to flow to consumers.

interconnection. If the LECs were required to implement equal access these problems could be averted in the future.

Respectfully submitted,

GENERAL COMMUNICATION, INC.

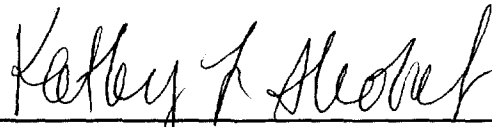
A handwritten signature in cursive script, appearing to read "Kathy L. Shobert", is written over a horizontal line.

Kathy L. Shobert
Director, Federal Affairs
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January 12, 1998

STATEMENT OF VERIFICATION

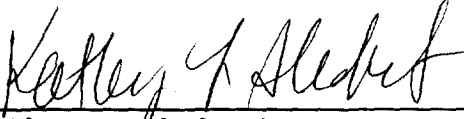
I have read the foregoing, and to the best of my knowledge, information and belief there is good ground to support it, and that it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct. Executed this 12th day of January, 1998.

A handwritten signature in cursive script, reading "Kathy L. Shobert", written over a horizontal line.

Kathy L. Shobert
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CERTIFICATE OF SERVICE

I, Kathy L. Shobert, do hereby certify that on this 12th day of January, 1998 a copy of the foregoing was sent by first class mail, postage prepaid, to the parties listed below.


Kathy L. Shobert

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